



United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

February 8, 2022

BY ECF

The Honorable Paul A. Crotty
United States District Judge
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, New York 10007

2/9/22
The matter will be adjourned
April 19, 2022 @ 2 PM. Time is excluded
to order!

Re: *United States v. Gustavo Betancourt, et al., 19 Cr. 661 (PAC)* *Paul A. Crotty*
CFM

Dear Judge Crotty:

The Government writes, with the consent of defense counsel, to request a sixty-day adjournment of the February 14, 2022 status conference in the above-captioned matter. The Government has substantially complied with its discovery obligations. It is collecting a small number of additional reports, which it will produce once it has received them from the Drug Enforcement Administration. Defense counsel has informed the Government that it requires additional time to review the discovery prior to deciding whether to file motions. Therefore, the parties jointly request an adjournment. With respect to the additional defendants, Carlos Alberto Salazar-Lotero and Franck Hernan Alvarez Espinal, the Government has no new information about their transport to the United States. The Government additionally requests, with the defendant's consent, that the Court exclude time from calculation under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), until the date of the next conference. The defendants require additional time to review discovery, and the parties are discussing a potential pretrial resolution of this case. An exclusion of time will serve the interests of justice, as it will allow these conversations to continue, while affording the defendant the opportunity to consider pretrial motions should the parties not reach a resolution.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

By: *[Signature]*
Jacob H. Gutwillig/Louis A. Pellegrino/Sheb
Swett
Assistant United States Attorneys
(212) 637-2215/-2617/-6522

cc: All counsel (by ECF)